DANIEL G. BOGDEN 1 **United States Attorney** District of Nevada KIMBERLY M. FRAYN 3 Assistant United States Attorney 333 Las Vegas Blvd. South Suite 5000 Las Vegas, Nevada 89101 Telephone: (702) 388-6336 5 Fax: (702) 388-6418 6 Attorneys for the Government 7 8 9 UNITED STATES DISTRICT COURT 10 11 DISTRICT OF NEVADA 12 -000-13 14 UNITED STATES OF AMERICA, 2:07-CR-132-PMP-RJJ 15 Plaintiff, 16 MOTION TO DISMISS 17 INDICTMENT AND **GENA RAMAEKERS,** QUASH ARREST WARRANTS a.k.a. Grazyna Ramaekers, 18 a.k.a. Grazyna Mikolajczyk, and 19 **DEZRINE JONES** Defendants. 20 21 The United States of America by Daniel G. Bogden, United States Attorney for 22

the District of Nevada, and Kimberly M. Frayn, Assistant United States Attorney, requests

pursuant to Rule 48(a) of the Federal Rules of Criminal Procedure, that the Court enter an

order allowing the government to dismiss without prejudice the charges brought against

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defendant **GENA RAMAEKERS**, a.k.a. Grazyna Ramaekers, a.k.a. Grazyna Mikolajczyk, and defendant **DEZRINE JONES**, which are contained in the Indictment in 2:07-CR-132-PMP-RJJ, and to quash the warrants for the arrests of **RAMAEKERS** and **JONES**, which issued in or about June 26, 2007, in connection with the Indictment. investigative agencies assigned to this case indicate that **RAMAEKERS** and **JONES** fled the United States to avoid prosecution in this matter, and their whereabouts outside of the United States remain unknown.

DATED this _1st __ day of November, 2011.

Respectfully submitted,

DANIEL G. BOGDEN **United States Attorney**

/s/ Kimberly M. Frayn KIMBERLY M. FRAYN **Assistant United States Attorney**

1 2 UNITED STATES DISTRICT COURT 3 DISTRICT OF NEVADA 4 5 -000-6 UNITED STATES OF AMERICA, 7 2:07-CR-132-PMP-RJJ 8 Plaintiff, 9 ORDER FOR DISMISSAL AND ٧. TO QUASH ARREST WARRANTS GENA RAMAEKERS, a.k.a. Grazyna Ramaekers, 11 a.k.a. Grazyna Mikolajczyk, and **DEZRINE JONES** 12 Defendants. 13 Pursuant to Rule 48(a) of the Federal Rules of Criminal Procedure, and upon 14 leave of Court, the United States Attorney for the District of Nevada hereby dismisses 15 16 without prejudice the charges brought against defendant GENA RAMAEKERS, a.k.a. Grazyna Ramaekers, a.k.a. Grazyna Mikolajczyk, and defendant **DEZRINE JONES** that are 17 contained the above-captioned Indictment. 18 19 Respectfully submitted, DANIEL G. BOGDEN 20 **United States Attorney** 21 /s/ Kimberly M. Frayn KIMBERLÝ M. FRÁYN 22 **Assistant United States Attorney** 23 24 25 26

<u>ORDER</u>

Leave of Court is granted for the filing of the foregoing dismissal. Further, the warrants for the arrests of **GENA RAMAEKERS** and **DEZRINE JONES**, which issued in or about June 26, 2007, in connection with the Indictment, are hereby ordered quashed.

DATED this _2nd day of November, 2011.

UNITED STATES DISTRICT JUDGE

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